

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**CELLULAR COMMUNICATIONS
EQUIPMENT LLC,**

Plaintiff,

v.

HMD GLOBAL OY,

Defendant.

§
§
§
§
§
§
§
§
§
§

C.A. No. 2:20-cv-00078-JRG

JURY TRIAL DEMANDED

**JOINT MOTION TO STAY ALL DEADLINES
AND NOTICE OF SETTLEMENT**

Plaintiff Cellular Communications Equipment LLC (“CCE”) and Defendant HMD Global Oy (“HMD Global”) (collectively, the “Parties”) respectfully submit this Joint Motion to Stay All Deadlines and Notice of Settlement. The Parties would respectfully inform the Court as follows:

The Parties have reached a settlement in principle of all matters in controversy, pending documentation, and request that the Court stay all deadlines, including the Markman hearing currently set for February 23, 2021, for thirty (30) days. A proposed order is submitted herewith.

Dated: January 29, 2021

Respectfully submitted,

<p><u>/s/ Jeffrey R. Bragalone</u> Jeffrey R. Bragalone (lead attorney) Texas Bar No. 02855775 Jonathan H. Rastegar Texas Bar No. 24064043</p> <p>BRAGALONE CONROY PC 2200 Ross Avenue Suite 4500W Dallas, TX 75201 Tel: (214) 785-6670 Fax: (214) 785-6680 jbragalone@bcpc-law.com jrastegar@bcpc-law.com</p> <p>ATTORNEYS FOR PLAINTIFF CELLULAR COMMUNICATIONS EQUIPMENT LLC</p>	<p><u>/s/ Deron R. Dacus</u> Deron R. Dacus State Bar No. 00790553 The Dacus Firm, P.C. 821 ESE Loop 323, Suite 430 Tyler, Texas, 75701 +1 (903) 705-1117 +1 (903) 581-2543 facsimile ddacus@dacusfirm.com</p> <p>Matthew S. Warren (California Bar No. 230565) Jen Kash (California Bar No. 203679) Erika Warren (California Bar No. 295570) Warren Lex LLP 2261 Market Street, No. 606 San Francisco, California, 94114 +1 (415) 895-2940 +1 (415) 895-2964 facsimile 20-78@cases.warrenlex.com</p> <p>ATTORNEYS FOR DEFENDANT HMD GLOBAL OY</p>
---	---

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), (i), I certify that counsel for CCE conferred with counsel for HMD on January 29, 2021 via email exchanges and, as reflected in the body of the Motion, the Parties agree to the form and substance of the Motion, the Motion is unopposed, and the parties jointly submit it to the Court.

/s/ Jeffrey R. Bragalone
Jeffrey R. Bragalone

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on January 29, 2021.

/s/ Jeffrey R. Bragalone
Jeffrey R. Bragalone